

E-filed 6/25/08

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR-07-00772-JF
11)
Plaintiff,)
12) **STIPULATION TO CONTINUE**
vs.) **STATUS HEARING; [PROPOSED]**
13) **ORDER**
DANIEL THOMAS REYES,)
14)
Defendant.)
15 _____)

16 Defendant and the government, through their respective counsel, hereby stipulate that,
17 subject to the court's approval, the status hearing date in the above-captioned matter, presently
18 scheduled for Wednesday, June 25, 2008 at 9:00 a.m., be continued to Wednesday, July 30, 2008
19 at 9:00 a.m. The reasons for the request are that the parties have come to an agreement in
20 principle to a resolution in the matter. The defense needs to submit to the prosecution some
21 language for the final plea agreement and that in turn needs to be approved by the United States
22 Attorney's office. The defense has not yet provided the requested language but expects to do so
23 within the week.

24 The parties further agree and stipulate that time should be excluded from and including
25 June 25, 2008 through and including July 30, 2008 for effective preparation of defense counsel,
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1 pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv). Accordingly, the United
2 States and the defendant agree that granting the requested exclusion of time will serve the interest
3 of justice and outweigh the interest of the public and defendant in a speedy trial.

4 Dated: June 24, 2008

/s/
NICHOLAS P. HUMY
Assistant Federal Public Defender

6 Dated: June 24, 2008

/s/
JOHN GLANG
Assistant United States Attorney


10 **ORDER**

12 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date
13 presently set for Wednesday, June 24, 2008 will be continued to July 30, 2008 at 9:00a.m.

14 IT IS FURTHER ORDERED, that the time between June 24, 2008 through and
15 including July 30, 2008, shall be excluded for effective preparation of defense counsel, pursuant
16 to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv).

17 IT IS SO ORDERED.

19 Dated: 6/25/08, 2008

18 
JEREMY FOGEL
United States District Judge